BLANK ROME LLP Attorneys for Third-Party Defendants Jeremy J.O. Harwood (JH 9012) 405 Lexington Avenue The Chrysler Building New York, NY 10174 (212) 885-5000

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNDERWRITERS AT LLOYDS a/s/o YOUNGLIN B & A CO., LTD., Plaintiff,

-against-

OCEAN WORLD LINES, INC.,

Defendant.

OCEAN WORLD LINES, INC.,

Third-Party Plaintiff,

-against-

ANL CONTAINER LINE PTY LIMITED t/a ANL; ANL SINGAPORE PTE LTD.,
Third-Party Defendants.

07 Civ. 6628 (PAC)

NOTICE OF MOTION UNDER 9 U.S.C. §§ 1 and 201 FOR AN ORDER COMPELLING ARBITRATION AND FOR A STAY

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, the Affidavit of Jeremy J.O. Harwood dated March 27, 2008 and all the exhibits thereto, Defendants ANL CONTAINER LINE PTY LIMITED t/a ANL and ANL SINGAPORE PTE LTD. (collectively "ANL") will move this Court before the Hon. Paul Crotty, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl

Street, New York, New York for an Order pursuant to 9 U.S.C. §§ 1 and 201 compelling Singapore arbitration and for a stay.

PLEASE TAKE FURTHER NOTICE THAT, under Local Rule 6.1(c) of the United States District Courts for the Southern and Eastern Districts of New York and the Court's individual practice rules, oral argument will be heard if so directed by the Court or upon application and that oral argument is so requested.

Dated: New York, New York April 9, 2008

Respectfully submitted,

BLANK ROME LLP ATTORNEYS FOR THIRD-PARTY DEFENDANTS

By: Joremy J.O. Harwood (JH-9012)

A Member of the Firm

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